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9 | Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

14 UNITED STATES OF AMERICA,
15 Plaintiff,
16
17 vs.
18 JASON EDWARD THOMAS
19 CARDIFF,
Defendant.

Case No. 5:23-cr-00021-JGB

**DECLARATION OF STEPHEN R.
COCHELL IN SUPPORT OF
JASON CARDIFF'S *EX PARTE*
APPLICATION FOR AN ORDER
PERMITTING INTERNATIONAL
TRAVEL AND RETURNING HIS
PASSPORT AND FOR VIDEO
CONFERENCE OF PRETRIAL
MOTION HEARINGS**

[Filed concurrently with Ex Parte Application and [Proposed] Order]

DECLARATION OF STEPHEN R. COCHELL

I, Stephen R. Cochell, declare as follows:

3 1. I represent Jason Cardiff in this matter. I make this declaration in support
4 of Jason Cardiff's Ex Parte Application for an Order Extending International Travel
5 and Returning his Passport.

6 2. Mr. Cardiff has been released on a \$530,000 appearance bond, justified in
7 the amount of \$500,000 with full deeding of real property. His release conditions
8 include: a travel restriction to the Central District of California and the Southern
9 District of Texas; a curfew between the hours of 8:00 p.m. and 8:00 a.m.; and,
10 placement in the custody of third-party custodian, Attorney Stephen Cochell. Lilia
11 Murphy and Brian Kennedy executed affidavits of sureties in support of the bond.
12 Ms. Murphy also deeded her home as collateral.

13 3. Mr. Cardiff is living with Attorney Cochell in the Kingwood, Texas, and he
14 is being supervised by United States Probation Officer Ryan McClellan of the
15 Southern District of Texas Pretrial Services Office who recently replaced Jack
16 Sherrod of that same office.

17 4. The Court previously granted permission to travel to Ireland to assist Mr.
18 Cardiff's wife for her medical needs and to help care for his ten year old daughter.
19 As set out in his request in that previous request, Mr. Cardiff had also scheduled
20 necessary medical appointments for himself, including a consultation with his
21 cardiologist. Unfortunately, Mr. Cardiff's cardiologist, Dr. H.B. has referred Mr.
22 Cardiff for a full cardiology workup. Mr. Cardiff also had unanticipated health
23 problems. Counsel received correspondence from Bellbridge Medical Centre dated
24 December 12, 2024 referring to tests performed on Mr. Cardiff and finding him
25 "medically unfit to fly until further notice" pending further testing. Counsel
26 submitted records under seal in support of the motion.

27 5. The Court granted an extension of Mr. Cardiff's international travel for
28 purposes of testing, evaluation and treatment. Dkt. 133.

1 6. Mr. Cardiff underwent testing recommended by his physicians.
2 Counsel is in receipt of correspondence from Mr. Cardiff's General Practitioner,
3 who notes that certain test results have not yet been received and that further testing
4 is required. Mr. Cardiff's General Practitioner concludes that Mr. Cardiff is still
5 "deemed unfit to fly" at this time. Medical records will be submitted under seal for
6 the Court's in camera review.

7 6. Mr. Cardiff has maintained contact with Ryan McClellan, a new
8 Pretrial Services Officer.

9 7. I talked directly with Mr. McClellan on December 13, 2024. Mr.
10 McClellan was unable to provide a position on whether Mr. Cardiff's request
11 because he believes that he must confer with Pretrial Services in Los Angeles. Mr.
12 McClellan did state that he was aware that Jack Sherrod, who he replaced, had
13 previously taken position for Pretrial Services and had not opposed earlier travel
14 requests and believed that Mr. Cardiff was cooperative with Pretrial Services.

15 7. On December 12, 2024, I contacted Valerie Makarewicz and Manu
16 Sebastian, attorneys for the Government and sought their concurrence in this
17 request. Ms. Makarewicz indicated that the Government opposed the motion.

18 8. Because Defendant cannot travel due to his health condition, the Court
19 has re-set the hearings on Defendants Motion to Dismiss Count 2 of the Indictment
20 and Defendants Motion to Dismiss Indictment Based on Double Jeopardy to January
21 13, 2025 at 2:00 p.m., Defendant requests that he be allowed to participate by video
22 conference.

23 I declare under penalty of perjury under the laws of the United States of
24 America that the foregoing is true and correct to the best of my knowledge.

25 Executed on this 13th day of December, 2024, at Houston Texas.

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/s/ Stephen R. Cochell
Stephen R. Cochell

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2 Dated: December 13, 2024

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